

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

MARK PIERCE, on behalf of himself and all others
similarly situated,

Plaintiff,

vs.

BEIJING-MATSUSHITA COLOR CRT COMPANY,
LTD.; CHUNGHWA PICTURE TUBES, LTD.;
CHUNGHWA PICTURE TUBES (MALAYSIA) SDN.
BHD.; HITACHI, LTD.; HITACHI AMERICA, LTD.;
HITACHI ASIA, LTD.; IRECO GROUP
CORPORATION; IRECO DISPLAY DEVICES CO.
LTD.; LG ELECTRONICS, INC.; LP DISPLAYS
INTERNATIONAL, LTD.; MATSUSHITA
ELECTRIC INDUSTRIAL CO., LTD.; PANASONIC
CORPORATION OF NORTH AMERICA; ORION
ELECTRIC CO., LTD.; ORION AMERICA, INC.;
KONINKLIJKE PHILIPS ELECTRONICS N.V.;
PHILIPS ELECTRONICS N.V.; PHILIPS
ELECTRONICS NORTH AMERICA; SAMSUNG
SDI CO., LTD.; SAMSUNG SDI AMERICA, INC.;
SAMTEL COLOR, LTD.; THAI CRT COMPANY,
LTD.; TOSHIBA CORPORATION; AND MT
PICTURE DISPLAY CO., LTD. and MT PICTURE
DISPLAY CO., LTD. a/k/a MATSUSHITA TOSHIBA
PICTURE DISPLAY CO., LTD.,

Defendants.

Case No.: 08-0337 (MMC)

STIPULATION RE EXTENSION OF
TIME FOR DEFENDANT TO
ANSWER, MOVE, OR OTHERWISE
RESPOND TO PLAINTIFF'S
COMPLAINT

WHEREAS Plaintiff Mark Pierce ("Plaintiff") filed a complaint in the above-captioned case on or about January 17, 2008;

WHEREAS Plaintiff alleges antitrust violations by manufacturers, distributors, and sellers of cathode-ray tubes and products containing cathode-ray tubes (collectively, "CRT products");

WHEREAS thirty-three complaints have been filed to date in federal district courts through the United States by plaintiffs purporting to bring class actions on behalf of direct and indirect purchasers alleging antitrust violations by manufacturers, distributors, and sellers of CRT products (collectively, "the CRT Cases");

WHEREAS the Judicial Panel on Multidistrict Litigation has now transferred the CRT Cases to this jurisdiction for coordinated and consolidated pretrial proceedings pursuant to 28 U.S.C. § 1407;

WHEREAS Plaintiff anticipates the possibility of a consolidated amended complaint in the CRT Cases;

WHEREAS Plaintiff and Defendant Philips Electronics North America Corporation ("Philips") have agreed that an orderly schedule for any response to the pleadings in the CRT Cases would be more efficient for the parties and for the Court;

WHEREAS Plaintiff agrees that the deadline for Philips to answer, move, or otherwise respond to the complaint shall be extended until the earliest of the following dates: (1) forty-five days after the filing of a consolidated amended complaint in the CRT Cases; or (2) forty-five days after Plaintiff provides written notice to Philips that Plaintiff does not intend to file a consolidated amended complaint, provided, however, that, in the event that Philips should

agree to an earlier response date in any CRT case, Philips will respond to the complaint in the above-captioned action on that earlier date;

WHEREAS Plaintiff further agrees that this extension is available, without further stipulation with counsel for Plaintiff, to all named defendants who notify Plaintiff in writing of their intention to join this Stipulation and abide by its terms as if they were Philips;

WHEREAS this Stipulation does not constitute a waiver by Philips of any defense, including, but not limited to, the defenses of lack of personal jurisdiction, subject matter jurisdiction, improper venue, sufficiency of process or service of process; and

WHEREAS with respect to any named defendant joining the Stipulation, this Stipulation does not constitute a waiver of any defense, including, but not limited to, the defenses of lack of personal jurisdiction, subject matter jurisdiction, improper venue, sufficiency of process or service of process.

THEREFORE, Plaintiff and defendant Philips, by and through their respective counsel of record, hereby stipulate as follows:

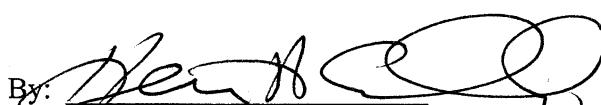
1. The deadline for Philips to answer, move, or otherwise respond to the complaint shall be extended until the earliest of the following dates: (1) forty-five days after the filing of a consolidated amended complaint in the CRT Cases; or (2) forty-five days after Plaintiff provides written notice to Philips that Plaintiff does not intend to file a consolidated amended complaint, provided, however, that, in the event that Philips should agree to an earlier response date in any CRT Case, Philips will respond to the complaint in the above-captioned action on that earlier date.

2. This extension is available, without further stipulation with counsel for Plaintiff, to all named defendants who notify Plaintiff in writing of their intention to join this Stipulation.

3. This Stipulation does not constitute a waiver by Philips, or any other named defendant joining this Stipulation, of any defense, including, but not limited to, the defenses of lack of personal jurisdiction, subject matter jurisdiction, improper venue, sufficiency of process or service of process.

IT IS SO STIPULATED.

Dated: February 22, 2008

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